

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application:	Duo Deng	Group Art Unit:	2836
Serial No.:	10/713,552	Examiner:	Amrany, Adi
Filed:	11/14/2003	Confirmation No.:	7977
For:	TWO-LEVEL PROTECTION FOR UNINTERRUPTED POWER SUPPLY		

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Dear Sir:

This paper is responsive to the Examiner's Answer mailed on December 24, 2008.

REMARKS

In the examiner's answer, dated December 24, 2008, the examiner submitted that "Janonis need only use one of the disclosed power traits and still maintain its disclosed functionality." See Examiner's answer page 4, line 10 – 11.

The applicant respectfully submits that the Janonis reference is only functional when it is capable of detecting and responding to any AC power characteristic fluctuations including frequency variations. A power system which is incapable of responding to a frequency variation would not meet the requirements of the embodiments of Janonis, and as such would not be obvious in view of Janonis.

The frequency range deviation detection of Janonis is a vital component of the device as evidenced by its presence in all of the claims in Janonis, as well as all of the embodiments disclosed in the specification. The claims are cited below to provide further evidence of the essential nature of the frequency range detection.

See independent claim 1 of Janonis which contains the clause "a line booster circuit coupled to the power source line in a first on-line mode of operation to increase the voltage supplied to the load from the power source line in response to the voltage of the power source line dropping below a first voltage threshold value while being above a second threshold value or deviating from a specified frequency range." Claims 2-5, and 10-11 also incorporate the same clause into their claims by virtue of their dependency.

See independent claim 6 of Janonis which contains the clause "increasing the amplitude of said AC line signal in response to the voltage of the AC line signal dropping below said first threshold value while being above a second threshold value or exceeding a predetermined range of frequency deviation by converting said AC line signal to a first DC voltage signal of a relatively low value, converting the first DC voltage signal to a second DC voltage signal having a relatively high value, inverting the second DC voltage signal to a load AD [sic] signal, and then supplying said load AC signal to the load in a first on-line mode." Claims 7-9 also incorporate this clause by virtue of their dependency.

Additional support for the applicant's interpretation that a device according to Janonis must be able to detect frequency deviations can be found in the abstract, as well as in the specification at column 3 lines 29-35, and throughout the remainder of the

specification.

Constructing a device that is incapable of responding to a variation in frequency would directly contradict the embodiments disclosed in Janonis, and would therefore destroy the functionality of the disclosed embodiments.

CLOSING

For the reasons set forth above, as well as the reasons presented by the applicant in his appeal brief dated October 15, 2008, the final rejection of claims 1-25 are improper and should be reversed.

Respectfully Submitted,

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